

11/01/04

MEMO TO: Ms. Marlene Dortch, Secretary
Federal Communications Commission

FROM: Greg Wells, GM
Three Eagles Communications
Columbus, NE

SUBJECT: Media Bureau Docket # 04-233 Comments

I wish to respond to the Commission's inquiry into localism. I applaud the FCC's interest in localism, as a company, Three Eagles Communications has continuously maintained our focus squarely on Main Street U.S.A. The following is a snapshot of our efforts to provide and maintain local content on our 5 radio stations located in Columbus, NE:

LOCAL NEWS:

Our local news team is composed of 1 full time News Director and 2 part time reporters. These individuals write and report news from a 75 mile radius of our broadcast facilities in Columbus, NE. They cover City Council meetings, County Board meetings, various Chamber of Commerce events as well as pertinent State events.

We provide 50 full local news casts per day Monday through Friday and 7 news casts per day on Saturday and Sunday. We also post all of our local stories, and some of State and National stories of importance, on our station's websites.

PUBLIC AFFAIRS:

We take public affairs seriously; radio provides the community with a voice that is unmatched. The public hears their neighbor's voices on the air, as opposed to their words transcribed in an article buried in the middle of the newspaper.

We open our microphones every day to citizens to be a "Guest DJ" on KLIR fm to tell the community about any event or cause they want to. On KTTT we carry a 1 hour program every day called Point of View as part of our local news and information segment. During this segment we invite participants involved with the county extension offices, local animal shelters, and commodity groups to come on the air and let us know what is happening in their organizations. We talked about the West Nile disease and how to protect yourself and your livestock from infected mosquitoes, safe ways for your kids to go trick or treating and any other topic that is timely and pertinent to the day's events.

We provide a voice to the local Chamber of Commerce' in the area, inviting them to inform our listeners as to the events their organizations are involved in. We provide a daily newsletter to our community that includes a news brief and a community calendar of events.

We have focused efforts this year in conducting Ascertainment Surveys with local community and civic leaders in a 75 mile radius of our stations utilizing the information garnered to assist those organizations to accomplish things important to their regions. In many of the surveys the issue of Methamphetamines was a chief concern. We took their concerns and turned them into a 5 day news series drawing information from Nebraska Highway Patrol, D.E.A., drug treatment counselors and local drug task force officers that serve as first responders in what listeners can do to help fight the spread of this dangerous drug.

We discovered that one of our communities was building a new performing arts center and needed help getting the project started. They put on a concert to raise funds and we provided all promotional activity for the event at no charge. The event raised over \$10,000 net for their new center and they now have the balance of the funds needed to get the center off the ground.

If we have a Chamber that has a challenge, we find a way to address the challenge with the Chamber to help their community grow. We do not charge any Chamber organization for their advertising, not 1 dime. We feel it our responsibility to help the Chambers as they help grow our communities.

We run a regionally produced call-in show called Problems and Solutions inviting listeners to call in and find solutions to every day problems, like how to get gum out of the carpet of your brand new Suburban, house hold cleaning tips, we interview local authors, sports heroes and chefs. We invite our State and local politicians in to tell us what they have been doing for us. Just last Friday Senator Nelson was in our studios for interviews.

In short, everything we do is a public affair. We are the voice of the communities we serve.

EMERGENCY PROGRAMMING:

As a station group, we handle severe weather coverage at a level that would be envied by most other broadcasters. I learned many years ago that if your listeners know they can count on you when there is danger in the air, they'll stay with you always. In the tornado belt we are forced into severe weather coverage in early spring and don't finish until late fall. Our last severe thunderstorm warning was just last Thursday and we had programmers in the building covering the storm track.

Because of the strength of our signal, we start tracking storms 150 miles out. It is common in the summer to be on the air covering severe weather throughout the night only to be relieved by the morning team.

One of the most rewarding calls we have had happened earlier this year. We received a call from a listener in Hallum, NE wanting to know how a storm was tracking. It is important to note that Hallum was leveled by a tornado just a few days prior to this call. The DJ answered his question about the storm's direction; he then asked the caller if he

listened to KZEN regularly as Hallum is/was about 85 miles southeast of Columbus. He told the DJ he was a regular listener and was listening to our coverage the night the tornado hit his community. I won't be so arrogant as to think we saved lives, but I know we provided timely information that allowed the people in that community to take cover. To this day I get chills thinking about that night and thank God we were doing what we do so well.

Beyond severe weather we work with local emergency Management organizations to make sure they know us and we know them. My News Director carries an Emergency Management pager so we are alerted first in the event of any kind of event, whether natural or man made. You should know we purchased the pager so the Emergency Management facility wouldn't have to.

We make it a point to force the newspaper to listen to us for complete news coverage because at the end of the day, we are more timely and more accurate.

POLITICAL PROGRAMMING:

As I write this memo on November 1, 2004, I am beginning to wonder if we cover anything but Politics. During this election season we have hosted 2 local debates for Mayoral candidates, 1 debate for local school Board candidates and we carried 1 debate for State Legislators.

In addition, each candidate was given the opportunity to be on the air as a "guest DJ" to speak to our listeners about the reasons they run. We have had a unique situation this year that differs from previous years in that not one politician refused to participate. These were all hosted at no cost to anyone or organization.

On November 2nd we will be providing hourly election coverage starting at 8:00pm and running until all ballots are counted, we will have 8 to 10 employees at various locations throughout our listening areas cover every election being held in our listening area as well as National updates as they come in.

The business of who is running our cities, counties and nation are of vital interest to our listeners and we make sure we keep them informed as to who is elected.

CULTURAL PROGRAMMING:

In this region of Nebraska we are heavily populated by citizens of European heritage. As a result, we have to play music that has an interest to them, namely polka. Every morning from sign on until 11:00 am KTTT hosts the only LIVE morning Polka show in Nebraska. I realize this sounds a bit odd, but this addressed a segment of listeners that were being underserved and has proven to be one of our most popular shows. We also provide 8 hours of locally produced Hispanic programming each week.

As a group of stations we cover over 225 local high school sporting events each year which includes Football, Boys Basketball, Girls Basketball, Girls Volleyball, Wrestling, Track and Field and Baseball. We bring the sporting accomplishments of our local high

school collegians to the airwaves for their friends and family to enjoy. It is common to see spectators watching the game and listening to our coverage in the stands. At the end of each school year we host an awards banquet and distribute \$3,000 in scholarships to our boys and girls high school collegiate athletes. The scholarships are based academic and athletic accomplishments and are distributed to 3 boys and 3 girls, each receiving \$500 in tuition assistance.

During the summer months we will be involved with a minimum of 30 fairs, parades and rodeos. We will sponsor and host 4-H events to encourage our youth to learn and be a part of agriculture. We broadcast from the fairs to give our listeners an opportunity to meet the DJ's they are so fond of. We are there because they are our neighbors in our communities and we are a part of their lives.

This group of stations provides thousands of dollars each month in PSA's to various non-profit groups. When the red Cross needs blood, they call us because we respond in the same fashion they do. And when we ask our listeners respond. I am including spreadsheets as attachments to this memo that document the value of PSA's we provide each month to give you an idea of our commitment to those we serve.

AGRICULTURE:

Our stations are in the heart of America's farmland. And as broadcasters we know agriculture is the lifeblood of our country. Everyday we provide in depth coverage of what is happening on the farms and ranches in our state. When the BSE outbreak occurred we were there with smart accurate coverage of what the impact could be to producers. We provide timely market analysis that producers rely on to make smart marketing decisions.

In the course of a day, we provide 18 - 5 minute market reports for our ag producers on KZEN. We provide 1 minute market updates on our 4 other stations, as well as long form programming on KJSK am in the form of a 1 hour ag talk show.

Our Farm Director is on the National Association of Farm Broadcasters Board of Directors and as the GM of these stations I have been asked to speak to this group this month in Kansas City at their annual meeting. Our commitment to Agriculture is company wide; our company was built in the upper mid-west because of this regions work ethic and commitment to our Agricultural Producers. We are in the Heartland of America and we cover it's lifeblood, Agriculture and we wouldn't have any other way.

SUMMARY:

As a GM of a rural group of stations, I am involved with multiple organizations. I serve on the Boards of the United Way, TeamMates Mentoring Program, The Columbus Area YMCA, and Nebraska Broadcasters Association and am deeply involved with various Chambers, and business organizations. I am involved because it matters to me what happens in my back yard and I want to make this area the best it can be. My radio stations help accomplish that mission every day. I have 50+ employees that care as deeply as I do. The commission calls this localism; we call it the way we live. We

function very much under the guise of the Golden Rule as a company and as a local cluster of stations. The commission is concerned about consolidation, I can tell you in Columbus, Nebraska it is good for the community and the region we serve.

I'm sure the commission will receive ample comments on why we don't need rules to dictate to us how we should provide local content. I don't need instructions on what we do everyday; rules would just slow us down in serving our listeners and our communities. Thanks for the offer of assistance, but with all due respect, we can do this better without the FCC's help.

Thank you for allowing me to comment.